

# **Exhibit 1**

**J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**

**Confidential**

**J.G. on 02/08/2023**

1  
2 IN THE UNITED STATES DISTRICT COURT  
3 NORTHERN DISTRICT OF GEORGIA  
4 ATLANTA DIVISION  
5 J.G., )  
6 Plaintiff, )  
7 vs. ) Civil Action File  
8 NORTHBROOK INDUSTRIES, ) No.: 1:20-cv-05233-MLB  
9 INC., d/b/a UNITED INN )  
10 AND SUITES, )  
11 Defendant. )  
12 )  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )

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CONFIDENTIAL

The Videotaped Deposition of

J.G.

(Taken by the Defendant)

Atlanta, Georgia

February 8, 2023

20 Reported by: Christopher J. Tomko  
21 Certified Court Reporter  
22 Georgia  
23 License No. 4802-6210-2922-0352  
24  
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**J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.****Confidential****J.G. on 02/08/2023****Pages 78..81**

Page 78	Page 80
<p>1 Q. Yeah. Yes.</p> <p>2 So you are in a room expecting a play.</p> <p>3 A. (Witness indicating.)</p> <p>4 Q. How does the play get to the room, or how</p> <p>5 does he know where to come? How does he get into the</p> <p>6 room?</p> <p>7 A. Okay. So, like, it did depend, but,</p> <p>8 like, if it was -- when I was with King, like, when</p> <p>9 you post the ad or whatever, it will say where you</p> <p>10 are at, but it won't have, like, the room number and</p> <p>11 stuff. So once the play is getting ready to come,</p> <p>12 like, he will tell them, like, what room to come to,</p> <p>13 or if there's no rooms available, like, where to park</p> <p>14 at or just park, you know, where you feel comfortable</p> <p>15 because it depended on them too.</p> <p>16 And then, like, we'll meet them down in</p> <p>17 their car. It was really like that with Cash too,</p> <p>18 honestly. The play didn't get the room number until,</p> <p>19 like, they said they were at the United Inn or</p> <p>20 whatever, and then they would just post the room</p> <p>21 number.</p> <p>22 Q. So they would give the -- the play the</p> <p>23 room number. And how -- they would just come and</p> <p>24 knock on the door? The play would come and knock on</p> <p>25 the door, or how would they get in the room?</p>	<p>1 A. For King and Cash.</p> <p>2 Q. Okay.</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Thank you. I see now what you mean by</p> <p>5 fifty-fifty.</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Got it.</p> <p>8 And when you had a -- when you would have</p> <p>9 a play in a car, was there a -- like, a particular</p> <p>10 place on the property you would go, or did it depend?</p> <p>11 A. No, it wasn't actually. It really</p> <p>12 depended on where the play wanted to park. So where</p> <p>13 they felt like they would be comfortable out in the</p> <p>14 parking lot, so whether that would be like the front,</p> <p>15 wherever, by the lobby, like where they felt like,</p> <p>16 you know, nothing would happen to them or whatever</p> <p>17 the case may be. Like, whether it's the front or</p> <p>18 whether they felt safer in the back, it -- it really</p> <p>19 just depended on the play.</p> <p>20 Q. Okay. And how would that work? Would a</p> <p>21 play know it was going to be a -- a car play when</p> <p>22 they arrived?</p> <p>23 A. Sometimes, yes. Because when King used</p> <p>24 to post for us, like, he will, like, specify that,</p> <p>25 like, car play or, um -- I can't think of, like, the</p>
Page 79	Page 81
<p>1 A. Yeah, they would knock on the door.</p> <p>2 Q. Okay. How many times did you have a play</p> <p>3 in a -- in a car at the United Inn?</p> <p>4 A. It was like a fifty-fifty thing. Like,</p> <p>5 when there's no room, it's a car play. The United</p> <p>6 Inn, like, the way that it looked -- like even in the</p> <p>7 day, like, at day or night, like, you know, it looks</p> <p>8 unsafe. So some of the plays would come, and they</p> <p>9 wouldn't want to come into the room because of, like,</p> <p>10 the type of people that were around the hotel or,</p> <p>11 like, what was going on. So they would say, like,</p> <p>12 they would feel more comfortable if we came to the</p> <p>13 car, so we came to them. So it was like a</p> <p>14 fifty-fifty thing.</p> <p>15 Q. Okay. So let me -- let me ask again. If</p> <p>16 you know, I mean, was it five times? Ten times? I'm</p> <p>17 just trying to get a number if you know how many</p> <p>18 times you had a play in a -- in a car.</p> <p>19 A. So if I made 12 plays a day, I would say</p> <p>20 I had six plays in a car.</p> <p>21 Q. Okay.</p> <p>22 A. A day.</p> <p>23 Q. Okay. And that was consistent for all --</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. -- the whole time?</p>	<p>1 other word, but, like, where they will come in.</p> <p>2 Q. Okay.</p> <p>3 A. So, like, sometimes, yeah, like, they</p> <p>4 knew beforehand it's going to be done in a car here,</p> <p>5 though. And then sometimes it wasn't supposed to</p> <p>6 have been the car play, but when they seen, like,</p> <p>7 the -- the hotel, that's what they requested. They</p> <p>8 didn't want to come in the room. They would rather</p> <p>9 do it in their car.</p> <p>10 Q. Okay. So you mentioned earlier this</p> <p>11 morning, I believe, Ms. [REDACTED] we were talking</p> <p>12 generally about walking around on the property.</p> <p>13 Okay?</p> <p>14 And so I want to ask you some questions</p> <p>15 about that.</p> <p>16 A. Uh-huh.</p> <p>17 Q. And we're -- again, of course, we're</p> <p>18 talking just about the United Inn.</p> <p>19 Okay?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. So am I correct that there were</p> <p>22 occasions you -- you had to walk around on the</p> <p>23 property?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Okay. Can you tell me generally when</p>